Grant Round Application for LRC-LIX(59)

TECHNICAL ADVISOR COMMENTS LRC-LIX(59)-A

"Review of North Dakota Regulations, Standards, and Practices Related to the Use of Coal Combustion Products"

Submitted by: Energy & Environmental Research Center

Request for: \$12,000; Total Project Costs: \$36,000

Principal Investigator: Tera Buckley

Project Duration: 12 Months

<u>Description of the Project:</u> EERC proposes to assess activities, laws, regulations, policies, guidelines, and use practices applicable in North Dakota pertaining to coal combustion products (CCPs). EERC intends to accomplish this by working with industry, state agencies, and other stakeholders. The objective is to identify any impediments or changes that could be made to improve CCP use.

Technical Peer Reviewers' Key Comments:

Reviewer 06-10

Contribution of findings could be extremely significant. Having knowledge of what is going on in other states in the region with respect to CCP use would be helpful in conducting this study. The methods are not particularly well developed. **Recommendation: Fund**

Reviewer 06-11

While mentioning similar CCP utilization studies for Texas, Florida and Pennsylvania, the proposal does not address the unique characteristics of CCP from combustion of local lignite – such as sodium and sulfate. It's unlikely that the project, before its completion timeline, will be able to qualitatively measure CCP utilization rate changes occurring as a direct result of the proposed review. The standard of success would be an improvement over utilization rates before the review. Discussion in the proposal does not clearly establish that the "before" usage data for CCP are "on the shelf" or will be obtained through the review. **Recommendation: Funding may be considered**

Reviewer 06-12

Success in this project will reduce the local environmental impact of lignite use in the state by reducing the number of additional CCP landfill sites that must be developed in the future as a repository for CCP wastes. While in the near term, it is unlikely that the results of this project will increase the amount of North Dakota lignite utilized for power generation, it is likely to result in an action plan that has the potential to reduce the environmental impact of CCP waste in the future. **Recommendation: Fund**

Technical Advisor's Recommendation: Fund

I recommend that the proposal be funded at a level not to exceed \$12,000 (small research funds from the Lignite Research Fund).

I agree with one of the reviewer's comments that it would be helpful for this project to "go to school" (in at least a cursory manner) on what other states in the region are doing with respect to CCP utilization and the policies affecting their use.

Conflict of Interest: EERC, Basin Electric, Great River Energy, and Minnkota